

APR 27 2015

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JAMES N. HATTEN, Clerk  
Deputy Clerk

THEMBI DLAMINI

Plaintiff,

v.

JUNA G. BABB and MICHAEL J.  
BABB,

Defendants.

Civil Action File No.  
1:13-cv-02699-WSD

**PLAINTIFF'S SUBMISSION PURSUANT TO PARAGRAPH 17 OF THE  
COURT'S STANDING ORDER AND SECTION A, PRETRIAL  
CONFERENCE REQUIREMENTS, OF DOCUMENT 46**

Pursuant to Paragraph 17 of the Court's "Standing Order Regarding Civil Litigation" and Section A, Pretrial Conference Requirements, of Document 46, "Order Setting Trial," Plaintiff hereby identifies the following witnesses that she will call for her case-in-chief at trial:

- 4/27/15
1. Thembi Dlamini  
c/o Audra A. Dial  
Kilpatrick Townsend & Stockton LLP  
1100 Peachtree Street, NE  
Suite 2800  
Atlanta, Georgia 30309  
Telephone: (404) 815-6500

Ms. Dlamini will testify about the Defendants' deception that led her to enter the United States and live with them, her experiences and interactions with the Defendants, the work she performed for them and at their direction, the length of time and hours of the day that she was performing services for them, the compensation (if any) she received from them for the work performed for them and others, and the damages caused by Defendants' conduct. The anticipated time for Ms. Dlamini's direct examination is two-and-a-half hours.

4/27/15 2. Suzanne Crafts  
Hay Group  
Sun Trust Plaza, 16th Floor  
303 Peachtree Street NE  
Atlanta, GA 30308  
Telephone: (404) 575-8700

Ms. Crafts is a Certified Compensation Professional and Certified Benefits Professional and is therefore an expert in the area of compensation. Ms. Crafts will offer expert testimony regarding the compensation that Ms. Dlamini should have earned for the services Ms. Dlamini performed for Defendants. Using publicly available information regarding salaries for comparable work received by individuals in Georgia in the relevant time period with a commensurate skill level as Plaintiff, Ms. Crafts will testify as to a range of compensation due to Plaintiff as a result of Defendants' conduct. The anticipated time for Ms. Crafts' direct examination is one hour.

As no depositions were taken in the case, there are no designations of deposition testimony. No motions in limine were filed.

Submitted this 15th day of April, 2015.

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